

COMMUNICATION PLAN FOR REVISED FUEL CYCLE FACILITY OVERSIGHT PROCESS

In its Strategic Plan, the NRC affirms its goal to “conduct an effective regulatory program that allows our Nation to use nuclear materials safely for civilian purposes and in a manner that protects the public and the environment...” The NRC has established performance goals in an effort to build and maintain public trust that it is an effective steward for nuclear materials. The four performance goals established for the Nuclear Materials Safety arena are:

1. Maintain safety, protect the environment, and the common defense and security;
2. Increase public confidence;
3. Make NRC activities and decisions more effective, efficient, and realistic; and
4. Reduce unnecessary regulatory burden.

The NRC also recognizes in its Strategic Plan that “licensees and other stakeholders are key participants in the collective efforts that will be necessary to achieve program success.” With this statement in mind, the NRC has undertaken an initiative to improve the effectiveness of stakeholder communications. One of the areas in which effective communication with stakeholders is desired is the Fuel Cycle Facility Oversight Process.

General Overview

The NRC is considering revising the regulatory process for oversight of nuclear fuel cycle facilities. The new approach will be an adaptation of the risk-informed and performance-based program in effect at all reactor plants since April 2000. The new approach uses risk insights to identify safety, safeguards and security cornerstones, which can be monitored by means of ~~performance indicators~~ and inspections and, possibly, performance indicators.

This communication plan is an approach toward informing and engaging internal and external stakeholders in the development of the revised fuel cycle facility oversight process (RFCFOP). This plan focuses our current efforts toward communicating possible revisions to the fuel cycle facility oversight process. It is in addition to the ordinary communication efforts related to fuel cycle facility oversight.

Key Messages

1. **Maintain safety, protection of the environment, and the common defense and security** by establishing a regulatory oversight framework that ensures that fuel cycle facilities continue to be operated safely and securely. Because the industry and risk analysis methods have matured sufficiently, a more risk-informed and performance-based approach is now appropriate. Public and employee health and safety remain the foremost considerations.

2. **Increase the effectiveness and efficiency** of fuel cycle facility oversight by focusing on the site areas, structures, systems, equipment and aspects of human performance areas that are most important to safety and safeguards.
3. **Enhance public confidence** by increasing the effectiveness, efficiency, stability, predictability, and objectivity of the oversight process, so that all stakeholders will be well served by the changes taking place.
4. **Reduce unnecessary regulatory burden** on licensees and other stakeholders as the regulatory process becomes more efficient, effective, and realistic.

Strategies

Stakeholders are being encouraged to participate in the change to the RFCFOP at all levels. A positive stakeholder perception of the revision process and outcome is being established in several ways.

- Information about the process will be accurate, timely, and easily obtainable.
- Messages will be factual, unbiased, balanced and in understandable language.
- Communications will be distributed to stakeholders in the most effective and efficient manner.
- Both internal and external stakeholders will be identified and their perceived communication needs determined. The best methods of communicating with each will be established.
- Various levels of interest and need will be accommodated.
- Various means of communication will be utilized, e.g., NRC web page, e-mail, telephone calls, print media, NUREGs, meetings, etc.
- NRC staff will pro-actively solicit stakeholder input to the process and give timely feedback.
- A communication plan will be implemented in concert with the various stages of RFCFOP development. Because each stage of development and each fuel cycle facility presents a unique communication challenge, a brief customized communication plan will be developed for each facility, using, as applicable, the milestones contained in Appendix B to this to the overall communication plan.

Actions

Potential internal and external stakeholders are being identified and their communication needs assessed. Appendix A lists potential stakeholders.

An implementation plan and schedule is being developed. Appendix B lists milestones for implementing the plan.

Costs associated with activities required to communicate with stakeholders are presented in Appendix C.

Audience and Activities

External Stakeholder Activities

The NMSS program office is identifying stakeholders that might be interested in the change process. An assessment is being made of the probable level of interest of each, and the best communication methods for communicating with them. The Office of Public Affairs (OPA) is providing assistance. All practical communication media are being considered. A letter will be sent to federal, state and local political representatives with potential interest, informing them of the RFCFOP effort. NRC managers and staff are providing presenters at conferences and meetings sponsored by NRC, industry, professional, and academic organizations.

Technical Stakeholder Public Meetings

RFCFOP stakeholder working group public meetings are being scheduled and published. These meetings provide the public, regulators, NRC, industry, Nuclear Energy Institute, and interest groups an opportunity to provide meaningful input as the RFCFOP is developed and implemented. Meeting results will be published on the NRC Web pages or distributed otherwise.

~~Initial~~ Local Public Stakeholder Meetings

Once the cornerstones of safety and the common defense/security and the broad scope of the RFCFOP are sufficiently developed, ~~but before pilot testing~~, NMSS and Regional staff will conduct a public meeting in the vicinity of each fuel cycle facility in conjunction with other meetings near the site. These meetings will be designed to provide the public with information as to why, what, when and how the RFCFOP is being revised. Local individuals, citizen groups, ~~local~~ officials, and licensees will be invited. These meetings will provide the NRC an opportunity to inform local citizens, facility workers, and interest groups of the changes to take place, and to solicit input. Licensee representatives will be asked to provide a short presentation at these meetings. Meetings will be conducted by NMSS and Region staff.

~~Follow-up Local Public Stakeholder Meetings~~

~~Following the RFCFOP pilot program, NMSS and Region staff will conduct another public meeting in the vicinity of each fuel cycle facility in conjunction with other meetings near the site. These meetings will be designed to provide the public information as to the status of the RFCFOP program; how they potentially could be affected; how to interpret the evaluation results, and solicit their views.~~

Internal Stakeholder Activities

NMSS and Regional personnel have much at stake as a result of this change effort. NRC management will reinforce support for the project and communicate that down into the organization. Staff participating in the change effort will keep appropriate NRC employees informed of current program activities. They will openly engage potentially affected headquarters and regional staff as the effort progresses. Sensitivity and change management techniques are necessary to ease anxieties about future reforms and how they might affect individuals.

Key regional managers and supervisors have a role in communicating to their technical staffs information about the RFCFOP development and implementation. To provide them with

information that they may pass on to their subordinates, periodic regional conference phone calls will be scheduled. To keep managers and staff of various HQ offices and various NMSS Divisions and Branches current, NMSS management will make key staff available to give presentations.

Regional Counterpart Meetings

Each Region holds inspector "counterpart" meetings during the year, which are designed to keep inspectors current and to provide an opportunity for participants to discuss issues of mutual concern. Key NMSS senior management and staff will be made available to give presentations at these meetings in order to transmit key messages, update participants on current activities, and solicit input from field inspectors and regional staff.

Fuel Cycle Counterpart Meetings

NMSS/FCSS also holds an annual counterpart meeting at Headquarters. Like the regional counterpart meetings, this meeting is ~~also~~ designed to provide an opportunity for participants to discuss issues of mutual concern.

Training Activities

NRC and cognizant stakeholder managers and staff will receive training in the new oversight program ~~for implementation of the pilot test~~. The training will be open to the public. Training will be provided later for other licensees. Thereafter the training will be maintained/given to NRC staff periodically by the Technical Training Center (TTC). NMSS staff will work closely with the TTC in the design and implementation of technical training courses.

Tools

Electronic Communication

Communicating electronically with both internal and external stakeholders is an important way to send information and solicit input/feedback. An RFCFOP web site has been established by NMSS for both internal and external use. This site provides updated information, links to other web pages, and sources for additional information about the RFCFOP.

To assure that all interested internal and external stakeholders are notified of the development and implementation of the RFCFOP, a "list server" has been established. This list server provides stakeholders the opportunity to identify themselves so they can be included in distributions.

Written Communication

In communicating with external stakeholders the agency is utilizing a variety of media. Internal written communication vehicles are being used to report on RFCFOP progress. These include the NMSS newsletter and soon will include the agency NR&C Newsletter. Each region will be encouraged to publish short articles in their regional employee newsletters. These may be in

electronic format. Licensee public relations personnel will be provided information on RFCFOP to use in their written communications endeavors.

Publications

Publications related to the RFCFOP will be made available to stakeholders. ~~The first is a NUREG that describes the new process in detail.~~ OPA will provide two brochures: one containing a general information brochure about fuel facilities, and the other will contain containing an overview of the new oversight program written in plain language. It will also provide readers with a list of web sites and telephone numbers for additional information. Also, as changes to the oversight process evolve, consideration will be given to publishing a NUREG that describes the new process in detail.

Regional Public Affairs personnel will provide appropriate assistance in announcing and participating in local public meetings. OPA will respond to inquiries from interested news organizations and will facilitate interviews.

Communication with Other Headquarters Staff and Managers

Office of Congressional Affairs

NMSS keeps OCA informed of RFCFOP progress, and provides information and presenters as requested. A letter will be sent to federal, state, and local political representatives informing them of the RFCFOP effort. If applicable, the state agency overseeing radiation safety matters will be asked to act as liaison with state legislative representatives.

EDO and Commission Staff

Periodic briefings will be conducted with the EDO and commission staff when requested, and prior to commission briefings.

Office of Enforcement

NMSS keeps OE informed of RFCFOP progress. OE will work closely with fuel cycle staff to support the development and implementation of a risk-informed oversight program, including possible changes to the Enforcement Policy.

Office of State and Tribal Programs

The Office of State and Tribal Programs (OSTP) meets periodically with agreement state representatives and committees. NMSS will keep OSTP informed of RFCFOP progress. Presenters will be provided as required at the annual OSTP Counterpart Meetings, e.g., with the Organization of Agreement States and the Conference of Radiation Control Program Directors.

Office of Nuclear Reactor Regulation

NMSS will actively maintain an effective working relationship with NRR during the period of program development in order to apply “lessons learned” from revision of the reactor oversight program.

Evaluation and Conclusion

The tools described in this plan are intended to communicate effectively with stakeholders and to provide feedback necessary to assess the agency’s role in enhancing stakeholder confidence. NMSS staff will review meeting results to determine if communications are effective and if goals are being achieved and will prepare a report that will be made available to stakeholders. Stakeholders will be kept informed of the results of all meetings on the revised oversight process.

The NRC Public Meeting Feedback form will be distributed to participants at public meetings and results will be analyzed at Headquarters. Information compiled from Feedback Forms will be made available to stakeholders.

Appendix A: POTENTIAL STAKEHOLDERS

There are six categories of potential stakeholders among external and internal constituencies.

Internal	External
Group A: NMSS, Research and OPA management and staff, Commission staff	Group D: state program offices, affected Congressmen, state legislators, other governmental agencies.
Group B: management and staff of NRR and other headquarters offices	Group E: press and other media, public interest groups, industry groups
Group C: regional management and inspectors and license reviewers	Group F: local community leaders, local interest groups, citizens, and individual licensees.

- Group A: Commission staff
Office of Nuclear Material Safety and Safeguards
Office of Public Affairs
Office of Nuclear Regulatory Research
- Group B: Office of Nuclear Reactor Regulation
Office of State and Tribal Programs
Office of Congressional Affairs
Office of International Programs
Advisory Committee on Reactor Safeguards
Office of Enforcement
Office of the General Counsel
Office of Administration
- Group C: Inspectors (Headquarters, Region and Resident)
Licensing/certification program managers and reviewers
Regulation/guidance writers
NRC regional management
~~Office of Enforcement~~
~~Office of the General Counsel~~
~~Office of Congressional Affairs~~
~~Office of Administration~~

Group D: District congressmen
State Liaison Officers
State government agency directors
State legislators
Federal agencies
EPA
OSHA
FEMA
DOE
DOD
DOS
GAO

Group E: Press
McGraw Hill
Local press
Industry
Nuclear Energy Institute
Fuel cycle facilities
Public Interest Groups
NIRS
Public Citizen
Nuclear Control Institute
UCS
Alliance for Nuclear Accountability
IEER
Institute on Energy and Environmental Research
National Resources Defense Council
Environmentalists, Inc.
Portsmouth & Piketon Residents for Environmental Safety and Security

Group F: Local government
Elected officials
Emergency responders
Affected local union representatives
Facility workers

Appendix B: MILESTONE GOALS FOR CONSIDERATION

~~At this stage, the Communication Plan is under review by stakeholders.~~ The schedule for communication activities will be established in cooperation with the stakeholders, and should consider the following actions, as appropriate.

1. Meet with licensee/certificate holder to develop a local stakeholder communications plan and schedule for their facility based on communication plan guidelines.
2. Identify and contact internal and external stakeholders.
3. Determine the best means of communicating with each group of stakeholders.
Examples: Public meetings of panel
NRC Web page
Newsletters
E-mail distributions
FR notices
Trade publications (INRC, NW, etc.)
NRC press releases (announcements)
Town meetings
Meetings with service organizations
Local newspapers
Local radio
Local TV
Local cable TV (Panel discussions, Interviews with NRC officials)
Public meetings
University forums
Public school presentations
4. Update the communication plan milestone schedule. Determine messages to be communicated to each stakeholder and by whom.
5. Revise the RFCFOP web page to accommodate developing needs / "lessons learned"
6. ~~Write and Publish, if/when appropriate, a initial~~ NUREG describing the program.
7. ~~Write and Publish~~ brochures.
8. ~~Schedule first set of~~ public meetings in vicinity of licensee facilities.
9. Schedule a meeting with State Liaison Officers to determine and coordinate desired state information needs (possibly in conjunction with the annual State Liaison Officer meeting).
10. Schedule meetings with other federal agency executives/staffs/committees (DOE, OSHA, DOS, EPA, IAEA, FEMA, etc.), as appropriate. Make presentations on proposed activity.
11. Meet with key media to explain RFCFOP and process for development.
12. Consider establishing an oversight advisory panel reporting to NRC.

13. Publish articles in NR&C. Provide copy to licensees and encourage them to publish articles in their employee and public relations newsletters.

Appendix C: Communication Costs

The number of public meetings that will be necessary to communicate the Revised Fuel Cycle Facility Oversight Process continues to evolve. The decision concerning the number of local meetings will be a cooperative decision involving NMSS, the Regions and the external stakeholders.

Many factors affect meeting cost. Among them are the number of NRC staff required in attendance, travel for staff, meeting preparation time, the cost of preparing pamphlets and brochures (which would be spread over several meetings), and the cost for a meeting room and rental of equipment (chairs, tables, audio-visual equipment). In addition there is the cost associated with preparing the staff for public meetings, including training in conducting meetings and in the revised oversight program.

The cost of conducting a small public meeting is estimated to be 0.2 FTE and \$4,000.

In FY2001, 8 local and 12 DC area meetings are under consideration by stakeholders. Total cost for the meetings is expected to be 0.5 FTE and \$30,000. This amount consists of incremental costs above the current level of effort for fuel cycle facility oversight effort.